



DISABILITY AND COMMUNICATION ACCESS BOARD

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INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the 2004 Americans with Disabilities Act Accessibility Guidelines (2004 ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

Docket: **DCAB 2011-02: Can grass or other materials such as plastic sub-surface reinforcement structure systems be used as an accessible route?**

Summary: The 2004 ADAAG does not specifically address grass as a type of surface material. The 2004 ADAAG does however, in the advisory, describe a “stable surface”, a “firm surface” and a “slip resistant” surface.

A “**stable surface** is one that remains unchanged by contaminants or applied force, so that when the contaminant or force is removed, the surface returns to its original condition”. There are times when grass is not a stable surface because when the ground is damp or wet, it will not return to its original condition after someone walks or propels themselves across it.

Similarly, if a “**firm surface** resists deformation by either indentations or particles moving on its surface”, then there are times that grass is not firm. When the sub-surface or dirt is not compacted, it will deform or indent as someone walks or a mobility device propels across it.

Lastly, if a “**slip-resistant surface** provides sufficient frictional counterforce to the forces exerted in walking to permit safe ambulation”, then when damp or wet, grass is not slip resistant. Water or moisture can make the grass surface slippery and it would not permit safe ambulation.

Plastic sub-surface reinforcement structure systems for grass allow the grass to cover the entire structure system so that it is not visible. While these systems may make the grass firmer and possibly add stability, when wet, the grass would still be slippery and not slip resistant. An accessible surface is one that meets all three criteria of being a “firm, stable and slip resistant” surface.

Ruling: For buildings or facilities subject to HRS §103-50,

ADAAG Section 302 Floor or Ground Surface

Grass and plastic sub-surface reinforcement structure systems with grass-embedding cannot be used as an accessible route.

[Rul: 01/03/2011] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.